## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

:

Denise Robin Marshall : No. 21-11658-AMC

Debtor

ANSWER TO MOTION OF MIDFIRST BANK
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted
- 6. Admitted. Debtor's son did not pay the mortgage.
- 7. Denied. Debtor has no proof of the same.
- 8. Debtor's son did not pay the mortgage.
- 9. Denied. Debtor asks for a chance to get caught up.
- 10. No response required.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 03/11/2024

A copy of this Answer is being served on Mark A. Cronin, Esquire, and the Chapter 13 Trustee.